



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO PLYMOUTH WATER COMPANY D.T.E. 06-53

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy (“Department”) submits to Plymouth Water Company (“Plymouth” or “Company”) its First Set of Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to Plymouth in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of requests, a reference to request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Plymouth or any of its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notation or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve copies of the responses as follows: (a) an original and four (4) copies to Mary L. Cottrell, Secretary of the Department; and (b) one (1) copy to all parties. All written documents (except those for which confidential treatment is sought) should also be submitted to the Department in electronic format using one of the following methods: (1) by e-mail attachment to dte.efiling@state.ma.us and to John.Geary@state.ma.us; or (2) on a 3.5" disk, or CD-ROM, IBM-compatible format. The text of the e-mail or the disk label must specify: (1) the docket number of the proceeding (D.T.E. 06-53), (2) name of the person or company submitting the filing, and (3) a brief descriptive title of the document (e.g., Response to Information Requests). The electronic filing should also include the name, title and phone number of a person to contact in the event of questions about the filing. Text responses should be created in either Corel WordPerfect, Microsoft Word, or as an Adobe-compatible PDF file. Data or spreadsheet responses should be compatible with Microsoft Excel. Documents submitted in electronic format will be posted on the Department’s Website, <http://www.mass.gov/dte>.
8. Responses are due on Tuesday, September 5, 2006.

INFORMATION REQUESTS

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| DTE 1-1 | Refer to Exh. SBA 1, Summary Tables 1 through 7. Please provide the underlying data in Microsoft Excel format. |
| DTE 1-2 | Refer to Exh. SBA 1, at 1 of 29, Supporting Details for Cost of Service & Rate Case, Schs. R-1 through R-10. Please provide the underlying data in Microsoft Excel format the underlying data and all calculations and workpapers supporting the numbers presented in your response. |
| DTE 1-3 | Refer to Mr. Alcott’s prefiled testimony at 5-6. Please provide an account-by-account itemization of Plymouth’s plant account balances for the years 1992 through 2005. Please provide the underlying data in Microsoft |

Excel format and all calculations and workpapers supporting the numbers presented in your response.

- DTE 1-4 Refer to Mr. Alcott's prefiled testimony at 5. Please provide all capital project work orders along with the final costs associated with each work order for the period from January 1, 1992, through December 31, 2005. As part of this response, provide any change orders associated with the work orders. If such materials do not exist in the form of capital project work orders, describe the way in which the Company maintains its plant records.
- DTE 1-5 Refer to Mr. Alcott's prefiled testimony at 7. Please provide, on an account-by-account basis, the Company's operating and maintenance expenses for 1992 as compared with 2005.
- DTE 1-6 Refer to Mr. Alcott's prefiled testimony at 8 and Sch. R-10. Please provide all documents, workpapers, calculations, assumptions, etc., which support the \$97,343 original cost of the land associated with Well No. 2.
- DTE 1-7 Refer to Mr. Alcott's prefiled testimony at 8 and Sch. R-10. Please provide all workpapers, calculations, assumptions, etc. establishing the \$1,450,000 revalued land associated with Well No. 2.
- DTE 1-8 Refer to Exh. SBA- 1, at 14, and Sch. A-1, at 21. Please explain why the Company reallocated its plant investment among various accounts during 1997.
- DTE 1-9 Refer to Exh. SBA- 1, at 14, and Sch. A-1, at 21. Please provide a breakdown of the \$303,147 in transmission and distribution mains that had been omitted from the Company's 1997 Annual Return. As part of this response, explain why the Company did not account for approximately 87 percent of its plant additions for that reporting year.
- DTE 1-10 Refer to Exh. SBA-1, at 14, and Sch. A-2, at 22. Please explain the "Reclassification Adjustments" provided in this schedule.
- DTE 1-11 Refer to Exh. SBA-1, Table 1. Please provide an itemized explanation of the \$1,949 in test year miscellaneous revenues.
- DTE 1-12 Refer to the "Attachment" to the prefiled testimony of Mr. Alcott. Please explain how the Company currently books system development charge revenues, and how such revenues will be booked in the future.

- DTE 1-13 Please provide a copy of the Company's most recent capital expenditures plan. If such a plan does not exist in written form, provide a summary of Company's anticipated capital expenditures for the year 2006 through 2010.
- DTE 1-14 Refer to Exh. SBA-1, Table 5. Please provide all workpapers, calculations, assumptions, etc., used to derive Plymouth's proposed charges for: (1) disconnection and restoration charge; (2) charge for testing meter; (3) cross connection testing charge; and (4) bounced check charge.
- DTE 1-15 Refer to Exh. SBA-1, Sch. R-3. Please provide the test year electric bills associated with the Lynn Circle and Lunn's Way pumping stations.
- DTE 1-16 Refer to Exh. SBA-1, Sch. R-4. Please provide a copy of the management contract associated with the Company's management fee. If no written contract exists, provide the names of the parties to the agreement, the scope of work to be performed on behalf of the Company, and the derivation of contract costs under the arrangement.
- DTE 1-17 Refer to Exh. SBA-1, Sch. R-5. Please provide both the most current billings and policies associated with the Company's general liability and excess liability insurance policies.
- DTE 1-18 Refer to Exh. SBA-1, Sch. R-5. Please provide all workpapers, calculations, assumptions, etc., used to derive the proposed gate valve and hydrant maintenance program expense of \$9,363.
- DTE 1-19 Refer to Exh. SBA-1, Sch. R-5. Please provide all workpapers, calculations, assumptions, etc., used to derive the proposed storage tank cleaning and inspection program expense of \$2,675.
- DTE 1-20 Refer to Exh. SBA-1, Sch. R-5. Please provide all workpapers, calculations, assumptions, etc., used to derive the proposed leak detection survey program expense of \$1,638.
- DTE 1-21 Refer to Exh. SBA-1, Sch. R-5. Please provide the basis for the proposed three-year amortization period associated with the Company's programmed maintenance expense.
- DTE 1-22 Refer to Exh. SBA-1, Sch. R-7. Please provide the most current property tax bills received by the Company.

- DTE 1-23 Refer to Exh. SBA-1, Sch. R-9. Please provide invoices, bills, etc., for the rate case expense reported for legal, rate consultant, and other direct expenses. Continue to supplement your response to this information request throughout the duration of this proceeding (e.g., DTE 1-23 -Supp A).
- DTE 1-24 Refer to the Company's 2005 Annual Return at 303. Please provide an itemized breakdown of the expenses booked to Account 610-11, "Miscellaneous General Expenses."
- DTE 1-25 Please provide a copy of the most recent comprehensive compliance evaluation performed on Plymouth by the Massachusetts Department of Environmental Protection ("DEP").
- DTE 1-26 Please provide all correspondence between Plymouth and the DEP regarding the Company's most recent comprehensive compliance evaluation.
- DTE 1-27 Refer to Mr. Alcott's prefiled testimony at 9. Please explain why the Company has proposed four increasing block rate steps.